

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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JO-ANNE FILIPKOWSKI, *individually and on behalf of all* :
others similarly situated, :

Plaintiff, :

v. :

BETHPAGE FEDERAL CREDIT UNION, *and* :
Does 1-100, :

Defendants. :
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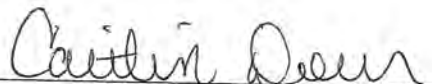
Case No. 20-cv-01754-JS-AKT

**DECLARATION OF CAITLIN DOUR IN SUPPORT OF REPLY TO PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION TO COMPEL ARBITRATION**

I, Caitlin Dour, state and declare as follows:

1. I am currently employed as a Marketing Coordinator at Bethpage Federal Credit Union.
2. On August 12, 2020 I was provided with a list of 209 Bethpage members who I am informed opted out of the Bethpage Arbitration Agreement implemented in October 2019. I was assigned the task of reviewing Bethpage member records to determine whether each of these persons had elected to receive account statements by mail or electronically in October 2019. To do this, I reviewed Bethpage's internal systems, which show how members have elected to receive their statements at a given time. These records are maintained by Bethpage in the ordinary course of its business and are created at or about the time of the transactions and events reflected in the records. I personally review and rely on these records to perform my duties. Based on my review of the records, I determined that 177 out of the 209 accounts had elected to receive statements by mail in October 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 19th day of August 2020 at Levittown, NY.


Caitlin Dour